

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND

In Re: \*  
KERYNN POOLE \*  
Debtor. \* Case No. :24-20570 - DER  
\* Chapter 13  
\* \* \* \* \*  
US BANK TRUST NATIONAL ASSOCIATION \*  
NOT IN ITS INDIVIDUAL CAPACITY BUT \*  
SOLELY AS OWNER TRUSTEE FOR VRMTG \*  
ASSET TRUST \*  
Movant, \*  
v. \*  
KERYNN D. POOLE, *et. al.* \*  
Respondents. \*  
\* \* \* \* \*

**RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY AND CO-DEBTOR STAY PURSUANT TO 11 U.S.C. §1301 (c) (REAL PROPERTY)**

Kerynn Poole, (the “Respondent”), by and through her undersigned counsel, hereby files this Response to Motion for Relief from Automatic Stay and Co-Debtor Stay Pursuant to 11 USC §1301(c) filed by US Bank Trust National Association, not in its individual capacity but solely as owner trustee for VRMTG Asset Trustee (“Movant”) and, in support thereof, states as follows:

1. The Respondent admits to the allegations contained in Paragraphs 1, 7, and 8 of the Motion.
2. The Respondent denies the allegations contained in Paragraphs 9 of the Motion.
3. The Respondent is without knowledge or information sufficient to form a belief as to the truth of the allegation contained in Paragraphs 2, 3, 4, and 5 of the Motion.
4. The Respondent admits to the allegations contained in Paragraph 4 in that the Debtor was in default at the time of filing bankruptcy but is without knowledge to form a belief as to the

amount of the prepetition arrears as alleged in Paragraph 4 of the Motion.

5. The Respondent admits to the allegations contained in Paragraph 6 in that the Debtor payments were in arrears but is without knowledge or information sufficient to form a belief as to the exact amount of the arrears alleged in such Paragraph 6 of the Motion.

KLEIN & ASSOCIATES, LLC

/s/ Diana L. Klein  
Diana L. Klein (27948)  
Klein & Associates, LLC  
2450 Riva Road  
Annapolis, Maryland 21401  
(443) 569-4574  
diana@klein-lawfirm.com

Attorney for Respondent

CERTIFICATE OF SERVICE

I hereby certify that on the 8<sup>th</sup> day of April 2025, a copy of the Response was served via the Court's CM/ECF system to the following:

- Eric VandeLinde [bankruptcy@bww-law.com](mailto:bankruptcy@bww-law.com)
- Rebecca A. Herr, Trustee [ECF@ch13balt.com](mailto:ECF@ch13balt.com)

I hereby certify that on the 8<sup>th</sup> day of April 2025, a copy of the Response was served First Class Mail, postage prepaid, to the following:

- John D. Poole  
127 Duval Lane  
Edgewater, MD 21037-1610

(s) Diana L. Klein  
Diana L. Klein